

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

K.O. et al.,

Plaintiffs,

v.

UNITED STATES OF AMERICA,

Defendant.

Civil Action No. 20-12015-TSH

**DEFENDANT’S ASSENTED-TO MOTION FOR LEAVE TO FILE A REPLY
IN SUPPORT OF ITS MOTION TO TRANSFER, OR ALTERNATIVELY
TO DISMISS PLAINTIFFS’ AMENDED COMPLAINT**

Defendant the United States of America, by and through its undersigned counsel, respectfully requests leave to file a reply memorandum, not to exceed 15 pages, in further support of its Motion to Transfer, or Alternatively to Dismiss Plaintiffs’ Amended Complaint, and in response to Plaintiffs’ Opposition, on or before August 12, 2022 (i.e., within two weeks of the filing of Plaintiffs’ Opposition). As support for this motion, Defendant states as follows:

1. On May 20, 2022, Defendant filed a Motion to Transfer, or Alternatively to Dismiss Plaintiffs’ Amended Complaint (ECF No. 50), and a 33-page supporting memorandum (ECF No. 51), arguing that the Court should transfer this action to the Western District of Texas, or alternatively dismiss the Amended Complaint for lack of jurisdiction.
2. On July 29, 2022, Plaintiffs filed a 40-page opposition to Defendants’ motion (ECF No. 61). Plaintiffs’ opposition contains extensive arguments and analysis going beyond the allegations contained in the amended complaint, including citations to caselaw issued after Defendant filed its motion.
3. Defendant therefore seeks leave to file a limited reply brief—not to exceed 15 pages—

addressing these arguments and assertions, to assist the Court in its analysis of Defendant's motion.

WHEREFORE, Defendant respectfully requests that the Court allow this motion and grant leave to file a reply brief on or before August 12, 2022.

RESPECTFULLY SUBMITTED

RACHAEL S. ROLLINS
United States Attorney

Dated: August 2, 2022

By: /s/ Rayford A. Farquhar
RAYFORD A. FARQUHAR
Assistant United States Attorney
U.S. Attorney's Office
1 Courthouse Way, Ste. 9200
Boston, MA 02210
(617) 748-3100
rayford.farquhar@usdoj.gov

LOCAL RULE 7.1 CERTIFICATION

I hereby certify that I conferred with counsel for Plaintiffs, who assent to the relief sought in this motion.

/s/ Rayford A. Farquhar
RAYFORD A. FARQUHAR
Assistant U.S. Attorney

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Rayford A. Farquhar
RAYFORD A. FARQUHAR
Assistant U.S. Attorney

Dated: August 2, 2022